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DIRECTTOU, LLC and ALLIANCE  
ENTERTAINMENT, LLC

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JONATHAN HOANG TO; JEFFRY  
HEISE; and JOSEPH MULL,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

DIRECTTOU, LLC; and ALLIANCE  
ENTERTAINMENT, LLC,

Defendants.

**CASE NO.: 3:24-CV-06447-WHO**

**STIPULATION TO EXTEND  
DEFENDANTS DIRECTTOU,  
LLC'S AND ALLIANCE  
ENTERTAINMENT, LLC'S  
RESPONSIVE PLEADING  
DEADLINES**

*[Filed concurrently with (Proposed)  
Order]*

Action Removed: 09/12/2024  
TAC Filed: 02/07/2025  
Response Date: 03/03/2025  
New Response Date: 03/10/2025

Pursuant to L.R. 6-2, Defendants DirectToU, LLC (“DirectToU”) and Alliance Entertainment, LLC (“Alliance Entertainment”) (collectively, “Defendants”) and Plaintiffs Jonathan Hoang To, Jeffry Heise, and Joseph Mull (“Plaintiffs” and, together with Defendants, the “Parties”), hereby file this Stipulation respectfully seeking an order from the Court extending Defendants’ responsive pleading deadlines (“Stipulation”). The Parties file this Stipulation based on the following facts:

1. On February 7, 2025, Plaintiffs filed a Third Amended Class Action Complaint (“TAC”), in relevant part adding Alliance Entertainment as an additional defendant in this case. [Dkt. No. 68.]. On February 10, 2025, the Clerk issued a Summons as to Alliance Entertainment.

2. Pursuant to Fed. R. Civ. P. 15(a)(1)(B)(3), DirectToU’s deadline to respond to the TAC is February 21, 2025.

3. Alliance Entertainment agreed to accept service of the TAC and Summons on February 10, 2025. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Alliance Entertainment’s deadline to respond to the TAC is March 3, 2025.

4. Defendants are diligently working on their response to the TAC. However, due to the recent filing of the TAC, the complexity of issues raised in this case, and competing deadlines in other cases, Defendants require a brief extension of time to file their response to the TAC.

5. Defendants have conferred with Plaintiffs, and Plaintiffs stipulate to extend Defendants’ deadline to respond to the TAC to March 10, 2025.

6. Defendants have not sought any prior extensions of time to respond to the TAC.

7. The request for an extension does not impact any other existing deadlines, as no other case deadlines currently are set.

**IT IS SO STIPULATED.**

Dated: February 12, 2025

Respectfully submitted,

**BAKER & HOSTETLER LLP**

By: /s/Bonnie Keane DelGobbo  
Bonnie Keane DelGobbo

*Attorneys for Defendants*  
DIRECTTOU, LLC and  
ALLIANCE ENTERTAINMENT, LLC

Dated: February 12, 2025

Respectfully submitted,

**HAMMONDLAW, P.C.**

By: /s/Ari Cherniak  
Ari Cherniak

*Attorneys for Plaintiffs*

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Bonnie Keane DelGobbo, hereby certify that I have obtained the concurrence in the filing of this document from all signatories listed above. I further attest that I have on file records to support this concurrence for subsequent production to the Court if so ordered of for inspection upon request.

Dated: February 12, 2025

/s/ Bonnie Keane DelGobbo